

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

UNITED STATES and the STATES of)
CALIFORNIA, COLORADO,)
CONNECTICUT, DELAWARE,)
FLORIDA, GEORGIA, HAWAII,)
ILLINOIS, INDIANA, IOWA,)
LOUISIANA, MARYLAND,)
MASSACHUSETTS, MICHIGAN,)
MINNESOTA, MISSOURI, NEVADA,)
NEW JERSEY, NEW MEXICXO, NEW)
YORK, NORTH CAROLINA,)
OKLAHOMA, RHODE ISLAND,)
TENNESSEE, TEXAS, VERMONT,)
VIRGINIA, WASHINGTON, the)
DISTRICT OF COLUMBIA, and DOE)
STATES 1-20, *ex rel.* BARBARA BAY,)

Plaintiffs,)

v.)

CLINOVATIONS, a product line of THE)
ADVISORY BOARD; OPTIMIZERX)
CORPORATION; PDR, LLC, d/b/a)
CONNECTIVERX; POINT OF CARE)
PARTNERS; CHANGE HEALTHCARE)
INC. f/k/a CHANGE HEALTHCARE)
SOLUTIONS, LLC;)
GLAXOSMITHKLINE PLC; PFIZER,)
INC.; ALLSCRIPTS HEALTHCARE)
SOLUTIONS; EPIC SYSTEMS)
CORPORATION; and DOE)
DEFENDANTS 1-100,)

Defendants.)

CLERK
BY  DEPUTY CLERK

Docket No.: 2:22-cv-27

FILED UNDER SEAL

NOTICE OF CONSENT TO DISMISSAL

On April 12, 2024, Plaintiff-Relator Barbara Bay filed Relator's Motion To Voluntarily Dismiss Without Prejudice, Pursuant to Federal Rule of Civil Procedure 41(a). Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the

Attorney General consents to the dismissal of this action without prejudice as to the United States, based on its determination that such a dismissal is commensurate with the public interest.

Pursuant to the California False Claims Act, California Government Code § 12652(c)(1), the State of California notifies the Court of its consent to dismissal without prejudice.

Additionally, the States of Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Iowa, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New Mexico, New York, North Carolina, Oklahoma, Rhode Island, Tennessee, Texas, Vermont, Virginia, and the District of Columbia (collectively the “States”), named as co-plaintiffs, join in this Notice and also consent to dismissal without prejudice.

The United States requests that the relator’s complaint, the summons, any case management order, the relator’s motion to voluntarily dismiss, this notice, and the attached proposed order be unsealed, and that the seal be lifted as to any matters subsequently occurring in this action. The United States requests that all other papers on file in this action remain under seal because, in discussing the content and extent of the United States’ investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A proposed order is being submitted to chambers.

Dated at Burlington, in the District of Vermont, this 15th day of April, 2024.

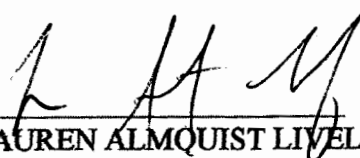
Respectfully submitted,

UNITED STATES OF AMERICA

BRIAN BOYNTON
Principal Deputy Assistant Attorney General

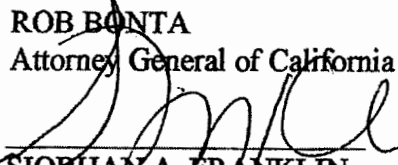
NIKOLAS P. KEREST
United States Attorney

By:


LAUREN ALMQUIST LIVELY
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
lauren.lively@usdoj.gov

JAMIE ANN YAVELBERG
EDWARD C. CROOKE
KIMBERLY FRIDAY
Attorneys, Civil Division
U.S. Department of Justice
P.O. Box 261
Ben Franklin Station
Washington, DC 20044
Telephone: (202) 305-3656
Email: Kimberly.i.Friday@usdoj.gov

By:

ROB BONTA
Attorney General of California

SIOBHAN A. FRANKLIN
Deputy Attorney General
Attorneys for California